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By Email: gorensteinnysdchambers@nysd.uscourts.gov

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I contacted the Court this morning by email requesting an ex parte communication to discuss a matter that was brought to my attention. Plaintiffs' counsel opposed this request. I now write to inform the Court that the representation set forth in defendants' April 26, 2022 opposition, stating that an email was sent to plaintiffs' counsel regarding a meet and confer, was in fact never sent. It appears the attorney involved drafted the email but failed to send it. Thereafter, there were communications between plaintiffs' counsel and the attorney involved concerning whether she ever sent the email. It has now become clear that additional misrepresentations were made by the attorney involved in those communications. Moreover, it also appears that the correction, which is attached hereto, was never filed on the docket.

This Office takes this matter very seriously and does not tolerate such conduct under any circumstances. As a result, this attorney's employment has been terminated. We sincerely apologize to the Court and all the parties for the inconvenience this has caused.

Respectfully submitted,
/s/
Patricia Miller
Division Chief
Special Federal Litigation Division

cc: ALL PLAINTIFFS' COUNSEL (by email)